```
Screen ICTQ____          BDS-TELIS DATA ENTRY SUBSYSTEM          11051998 15:40
Command _______            Translation Questionnaire
CCNA EXF  PON 1998-21479.50593  VER __  ICSC SB01  ReqTyp MD  Act C
ECCKT AC198301                                                Status F
ASR                 EC Status        RPON 1997-21479-14000
========================== Administrative Section ==========================
 Tech-Con JEFF NOBLE_____     Tel 813-829-2812-____  DB Test TN ___-___-____
 ATP _  BCR3 _______  BCR5 _______  BCR6 _______  M64 __ GLARE _
============================== Common Section ==============================
 Ref TG  TG  TSC          APON          DIR ANI DA   Tk   Test Tk  SAC OT OVLP
     Act TYP                                  ACC  Seq  ANI Sig Non
  A   E   _  AC198301 _______________  __  _   _   __   _   __  _   _   _
  B   _   _  _______  _______________  __  _   _   __   _   __  _   _   _
  C   _   _  _______  _______________  __  _   _   __   _   __  _   _   _
  D   _   _  _______  _______________  __  _   _   __   _   __  _   _   _
 Ref CTO OSAC USDO CSP CPN CIP FACT AltRef  FACT XXXX FACT XXXX FACT XXXX
  A   _  ___  _   _   _   _   _   _______  _   ____  _   ____  _   ____
  B   _  ___  _   _   _   _   _   _______  _   ____  _   ____  _   ____
  C   _  ___  _   _   _   _   _   _______  _   ____  _   ____  _   ____
  D   _  ___  _   _   _   _   _   _______  _   ____  _   ____  _   ____
Remarks
      CHANGE TANDEM TO MULTI TANDEM._____________________________________
      ____________________________________________
ICS9098I - NEXT COMPLETED.
```

```
Screen  ICTQ2___          BDS-TELIS DATA ENTRY SUSBSYSTEM            11051998 15:40
Command _________  .  Translation Questionnaire (Continued)
-------------------------------------------------------------------------------
    CCNA EXF PON 1998-21479.50593  VER __ ICSC SB01 ReqTyp MD  Act C
    ECCKT AC198301                                              Status F
    ASR                EC Status       RPON 1997-21479-14000
********************** Common Section (Continued) ==========================
Ref BRAND ANNC                                              CCW
 A    _  ____________________________________________       Y
 B    _  ____________________________________________       _
 C    _  ____________________________________________       _
 D    _  ____________________________________________       _

 C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX
   404744
 C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX

 C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX

 C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX C.NPA/NXX

 C.NPA/NXX C.NPA/NXX  _______   _______   _______   _______   _______

ICS9098I - NEXT COMPLETED.
```

```
Screen  ICTQD___          BDS-TELIS DATA ENTRY SUBSYSTEM              11051998 15:40
Command _________           Translation Questionnaire

    CCNA EXF  PON 1998-21479.50593  VER __  ICSC SB01  ReqTyp MD  Act C
    ECCKT AC198301                                               Status F
    ASR                 EC Status        RPON 1997-21479-14000

========================== Feature Group D Section ==========================
  ACIC 1) ____ 2) ____ 3) ____ 4) ____ 5) ____ 6) ____ 7) ____ 8) ____ 9) ____
              CIC 0393   CCless CC   Intra _   Inter _   Coin-EA Y
ROUTING MATRIX:                    Service Prefixes
ANI II                          1+  0+  1+  0+      1+  0+
Digits All  A  1+ 0+ 00 011 01 500 500 700 700 800 900 900 0-L 411 LPDA 0+L
All        A   _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
00             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
01             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
06             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
07             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
20             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
27             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
52             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
61             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
93             _  _  _  _   _  _   _   _   _   _   _   _   _   _   _    _
ICS9098I - NEXT COMPLETED.
```

Screen ICTQE___ BDS-TELIS DATA ENTRY SUBSYSTEM 11051998 15:40
Command ________ Translation Questionnaire

CCNA EXF PON 1998-21479.50593 VER __ ICSC SB01 ReqTyp MD Act C
ECCKT AC198301 Status F
ASR EC Status RPON 1997-21479-14000

==================== Feature Group D Section (Continued) ====================

Routing Exception Matrix

Service Prefixes

ANI II Digits	Line/Class Service	All 1+	0+ 00	011 01	1+ 500	0+ 500	1+ 700	0+ 700	800	1+ 900	0+ 900	0-L	411	LPDA	0+L
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_
__	________	_ _	_ _	_ _	_	_	_	_	_	_	_	_	_	_	_

ICS9098I - NEXT COMPLETED.

```
Screen  ICASR___          BDS-TELIS DATA ENTRY SUBSYSTEM          10121998 17,07
Command _______                 Access Service Request                Archive
Transfer Stat  R                                                       ECI _
     CCNA ICF PON 1998-21479-50593 VER __ ICSC SB01 D/TSENT 10121998 0438PM
                                                                       QR _
D/T Proc 10121998 16,20  D/T Upd 10121998 16,38  Status F  CC ____
D/T Sel  10121998 15,40  D/T Ret 10121998 16,00  SPA _     CNO ___________
ASR      9828500223      EC Status A              FDT _____
DDD  10141998 Prjct _____________ NOR __ __ LUP ___ ReqTyp SQ Act C RTR S_
SUP _  AFO ____ Exp _ AENG _ ALB _ AGAUT _ Dated _______ LTP MD MD
Cust   INTERMEDIA/PHONE ONE_____  FBA ____
FNI    ____________               CFNI ____________________  Unit C PIU 100
CKR    TG0018284_____________________________________________       PLU ___
ECCKT  AC198301_____________________________________________  Qty 0000000
                                                              Qty _______
BAN    N/A_________ ASG ______  BIC _ TEL ___ ___ ____ BIC-ID ___________
TSC    AC198301          ACTL ATLNGABU01T APOT ___________ LA _ AI _
ROrd   ___________________ SPEC _______  PPTD ________ PFPTD ________
RPON   1997-21479-14000  CCVN _______     ASC-EC ____ TSP _________-__
SAN    ____________________________       AFG _    TQ __   BSA _
Remarks THIS ORDER IS A CHANGE ORDER TO CHANGE THE ATLNGABU01T TANDEM TO A MULT
I TANDEM.SEE ORIGINAL ORDER WHICH IS THE RPON.TRF TYPE SHOULD BE TMTM.TTT=3.___
_____________________________
ICS0001I - FIND COMPLETE.
```

559

Escalate

Tiffany

H:11

1-205-988-6580

NIRI

```
Screen  ICADM___         BDS-TELIS DATA ENTRY SUBSYSTEM          10121998 17.08
Command ________         ASR Administration Information
------------------------------------------------------------------------------
    CCNA ICF  PON 1993-21479-50593  VER __  ICSC SB01  ReqTyp SD  Act C
    ECCKT AC198301                                                Status F
    ASR 9828500223    EC Status A     RPON 1997-21479-14000
============================ Billing Information =============================
BillNm  INTERMEDIA COMMUNICATIONS   SBilNm __________________________
ACNA    ICF    TE A    EBP ______
Street  3625 QUEEN PALM ROAD_____   Fl ___ Rm ______  VCVTA ________________
City    TAMPA____________________   State FL  Zip 33619-______
BillCon LINE COST DEPT_ Tel 813-621-0011-____  SCL _ VTA _________________
============================ Contact Information =============================
Init    JEFF NOBLE_____             Tel 813-829-2812-____
Street  3625 QUEEN PALM__________   Fl ___    Rm ______
City    TAMPA____________________   State FL  Zip 33619-______

DsgCon  JEFF NOBLE_____             Tel 813-829-2812-____
Street  FAX 813-829-2841_________   DRC FAX   FDRC ___  Fl ___  Rm ______
City    TAMPA____________________   State FL  Zip 33619-______

ImpCon  NOC____________             Tel 800-940-0033-____
MTC     TEC ON DUTY                 Tel 800-940-0033
ICS9098I - NEXT COMPLETED.
```

TM-TM

```
Screen  ICSPE___          BDS-TELIS DATA ENTRY SUBSYSTEM          10121998 17:08
Command _______             ASR Special Access Service
    CCNA ICF  PON 1998-21479-50593  VER __  ICSC SB01  ReqTyp SD  Act C
    ECCKT AC198301                                               Status F
    ASR 9828500223     EC Status A      RPON 1997-21479-14000
Circuit Detail: NC HCE- NCI 04DS6.66____ TLV _____ _____  S25 ____ EXR _
TRF _ MST _ GETO _ GBTN ___-___-____ HVP _ NSIM _ SR ___
SecNCI _____ SI _ SPOT _____ SecTLV _____ _____ CKLT _____
NSL __ ATN _____ CFA N/A_____
CPT _____-_____ CFAU _ SSS _ SCFA _____
MUXLoc _____ HBAN _____ WACD1 _____
PRIADM _____ WACD2 _____
SECADM _____ CLK _ NVC ___ PSPEED _____ LMP _ N/U _ ZLG _ BSC _ ETET _
Location Sect.:SecLc EATLNGABU01T_____ Street N/A_____
Bldg N/A_____ Fl N/A_____ Rm N/A_____ City ATLANTA_____ St GA
ALoc _____
_____ OTC ____ WKTel ___-___-____
ACTel ___-___-____-____ EUCon _____ EUTel ___-___-____-____
LCon _____ ACC _____
REN ____ JKCod _____ PCA _____ JKNum __ JKPos __ JS _ SMJK _
CTX Tel ___-___-____ CTX Nm _____ ISDN SEQ __ of __
RMKS  THIS IS JUST A CHANGE ORDER TO CHANGE TANDEM ATLNGABU01T TO A MULTI TAND
      EM._____
ICS9098I - NEXT COMPLETED.
```

EXHIBIT C
E-MAIL FROM MICHAEL LOFTON TO KASEY HOWARD

[redacted]

From: Lofton, Michael G. (EXCH)
Sent: Thursday, February 18, 1999 12:28 PM
To: 'kasey.howard@bridge.bellsouth.com'
Cc: Thomas, Ed L. (EXCH)
Subject: Closing ASR 1998-21479.50593

Kasey,

Per our conversation this morning, concerning the multiple tandem Architecture, Intermedia concurs with your understanding that Bell South requested this to be deployed to assist with the completion of traffic being blocked due to capacity limitations in the Buckhead tandem. We also understand that Bell South has requested that this arrangement be left in place until BellSouth has worked through the capacity problems in the Atlanta area and specifically the Buckhead tandem. We reiterate our preference to continue our direct interconnection to all the tandems in the Atlanta LATA.

Thus, I am closing out the ASR 1998-21479.50593 that you requested Intermedia submit to BellSouth in November in order to keep your internal records consistent with BellSouth's circuit deployment.

Thanks

Mike Lofton
Manager - Network Facilities
813-829-2284
mglofton@intermedia.com

Ed Thomas

County of HILLSBOROUGH)
) ss.
State of FLORIDA)

AFFIDAVIT OF
EDWARD L. THOMAS

I, EDWARD L. THOMAS, being first duly sworn upon oath do hereby depose and state as follows:

1. My name is Edward L. Thomas. I am employed by Intermedia Communications Inc. ("Intermedia") as Director – Voice Planning & Deployment. My business address is 3625 Queen Palm Drive, Tampa, Florida 33619, and my telephone number is (813) 829-2930. In my capacity as Director – Voice Engineering, I am responsible for engineering the moves, adds, and changes of the telecommunications switching requirements within the Intermedia voice network. This includes the ordering and placement of central office switching equipment, ordering and placement of circuit groups between various exchanges, network capacity management, and network traffic management. My telecommunications background spans thirty-five years of experience and a myriad of technical training courses and seminars. I have attended Kent State University and Wooster (Ohio) College. Prior to joining Intermedia, I was employed by GTE for twenty-nine years in various management capacities.

2. I am submitting this Affidavit on behalf of Intermedia. The purpose of my Affidavit is to describe the manner in which Intermedia interconnects with BellSouth Telecommunications, Inc.'s ("BellSouth") facilities for the purpose of exchanging local traffic.

3. Intermedia is one of the largest independent competitive local exchange carriers ("CLECs") in the United States. In Georgia, Intermedia provides local exchange service primarily to business customers utilizing its telephone switches located in Atlanta. In order to reach end-users located in Georgia, Intermedia interconnects with BellSouth's facilities by purchasing so-called "interconnection trunks" from BellSouth. These "interconnection trunks" are used to connect Intermedia's switches with BellSouth's switches for the purpose of exchanging traffic. BellSouth's switching facilities are of two types: tandem switches and end office switches. A "tandem switch" is an intermediate switch or connection between an originating telephone call location and the final destination of the call; it serves to connect central offices when direct interoffice trunks are not available. An "end office switch" is the last switching point (i.e., central office) in the network before the subscriber's telephone equipment. Access to end users through direct connections to "end offices" subtending the "tandem" switches are appropriate where the volume of traffic so dictates; otherwise, connections to tandem switches are more economical. I provide as **EXHIBIT A** a diagram illustrating how a typical CLEC voice switch is connected to BellSouth's switch or switches.

4. There are at least two ways of reaching end users served out of BellSouth's end-offices. A CLEC could establish direct connections to each tandem within a local access and transport area ("LATA") in order to have access to the end-offices subtending each such tandem. For example, a CLEC could establish direct connections to Tandem A in order to reach end-users served out of end offices A-1, A-2, A-3, and so on; similarly, direct connections to Tandem B could be had in order to have access to end-users served out of end offices B-1, B-2, B-3, and so forth. I will refer to this as "Single Tandem Architecture." A diagram is provided in **EXHIBIT B**.

5. Another option is for a CLEC to interconnect to a single access tandem within the LATA to access all other tandems and end offices subtending the tandems. For example, a CLEC could establish trunk terminations to Tandem A, which would allow the CLEC to connect to the end offices subtending Tandem A, as well as to connect to end offices subtending Tandems B, C, and D via direct connections to Tandem A. The ultimate goal is to have access to all the tandems and end offices within a LATA through a single connection to one of the tandems (or at a minimum, through connections to less than all access tandems within the LATA). I will refer to this as "Multiple Tandem Architecture." A diagram is provided in EXHIBIT C.

6. The choice of whether to use a Single Tandem Architecture as opposed to a Multiple Tandem Architecture would depend on the particular needs of the CLECs. As a general rule, however, although Multiple Tandem Architecture is more economical because a CLEC need only interconnect with one tandem to have access to several tandems and the subtending end offices, this architecture is technically inferior. In particular, from an engineering standpoint, call efficiency is poorer in a Multiple Tandem Architecture setting. This is because the call is switched at multiple levels. On the other hand, Single Tandem Architecture offers high call efficiency because the amount of switching is significantly less. CLECs whose traffic volumes are significant tend to choose Single Tandem Architecture because their traffic volumes justify individual direct connections to each tandem. This is the case with Intermedia.

7. Prior to the first quarter of 1997, Intermedia had direct connections to the tandem switch in Buckhead. This allowed Intermedia to reach end-users that were served out of end-offices subtending the Buckhead tandem. Similarly, end-users served out of end offices

ıbtending the tandem switch located in Norcross were reached through Intermedia's connection to the Buckhead tandem.

8. Beginning in the first quarter of 1997, BellSouth stopped routing traffic to end-offices subtending the Norcross tandem via direct connections to the Buckhead tandem. BellSouth insisted that the interconnection agreement between BellSouth and Intermedia required direct connections to each tandem in the Atlanta, GA LATA. Consequently, Intermedia established individual direct connections to the Buckhead tandem and the Norcross tandem in order to reach end users served by the various end offices subtending the Buckhead and Norcross tandems, respectively.

9. Beginning in or around April 1998, Intermedia began experiencing congestion problems with the Buckhead tandem. Specifically, Intermedia was unable to obtain trunk ·rminations in the Buckhead tandem, the result of which was effectively to deny access to Intermedia's customers. Intermedia promptly brought this problem to BellSouth's attention, but the lack of available trunk terminations in the Buckhead tandem persisted for several months. BellSouth assured Intermedia that the addition of the Eastpoint tandem would alleviate the congestion at Buckhead. Indeed, when the Eastpoint tandem became operational, the congestion in the Buckhead facility was alleviated somewhat, but not for long. Soon thereafter, around the third quarter of 1998, the Buckhead tandem began experiencing congestion problems once again. The congestion problem in the Buckhead tandem became progressively worse and hit a critical point during the latter part of 1998, forcing me to escalate the problem sometime in December 1998 to Jon Rey Sullivan, Operations Assistant Vice President at BellSouth. I have since held several discussions with Mr. Sullivan, most recently in March 1999, to address the congestion

problem in Buckhead; however, the problem continued to persist until mid-April 1999 when BellSouth added circuits with Intermedia.

10. I believe that BellSouth may have converted Intermedia's direct interconnection to the Buckhead tandem into a multi-tandem architecture beginning in or around June 1998, *without* Intermedia's knowledge and consent, in order to alleviate the congestion in Buckhead. I believe this to be the case because Kasey Howard of BellSouth asked Dean Podzamsky of Intermedia to submit an Access Service Request ("ASR") to BellSouth in or around September of 1998, requesting the Buckhead tandem trunk group to be made multi-tandem. However, when Intermedia submitted the ASR to BellSouth in November 1998, *pursuant to BellSouth's request*, BellSouth advised Intermedia that the ASR could not be processed because the Buckhead tandem was already multi-tandem. This leads me to conclude that BellSouth had already converted Intermedia's interconnection to the Buckhead tandem into a multi-tandem architecture prior to the time BellSouth requested Intermedia to submit an ASR requesting multi-tandem. This is also consistent with Mike Lofton's conversation with Mr. Howard in late 1998, in which Mr. Howard advised Mike Lofton to submit an ASR for multi-tandem in order to make BellSouth's internal records consistent with its circuit deployment. Please see Mike Lofton's Affidavit.

11. I am unable to determine whether a multi-tandem architecture is in place *today* for Intermedia, although I am reasonably certain that the Buckhead tandem was made multi-tandem, on BellSouth's instance and without Intermedia's consent, in or around June 1998, as discussed above. It is beyond any doubt, however, that Intermedia is not, *on its own*, sending traffic destined to the end offices subtending the Norcross tandem via the Buckhead tandem. Specifically, traffic that is destined to the end offices subtending the Norcross tandem is sent

directly to the Norcross tandem, and traffic that is destined to the end offices subtending the Buckhead tandem is sent directly to the Buckhead tandem. BellSouth may well be using multi-tandem to route Intermedia's traffic today, but certainly *not* because Intermedia requested it. Indeed, once Intermedia's traffic is sent to the appropriate tandem, e.g., Buckhead tandem, Intermedia has no control over the ultimate routing of that traffic (and in fact Intermedia has no way of knowing whether that traffic was routed in the manner requested by Intermedia, unless BellSouth produces its translation records). As stated previously, Intermedia prefers to have direct, individual interconnections to all the tandems in the Atlanta LATA, for technical and other reasons.

12. In conclusion, Intermedia has never requested, *on its own*, multi-tandem architecture in the Atlanta LATA in June 1998 or anytime thereafter. Intermedia did, *at BellSouth's request*, submit an ASR requesting temporary conversion to multi-tandem architecture in order to relieve congestion in BellSouth's tandems. That ASR has since been cancelled by both Intermedia and BellSouth. It has never been Intermedia's intention to have a multi-tandem architecture on a permanent basis.

FURTHER AFFIANT SAYETH NOT.

Edward L. Thomas

SUBSCRIBED AND SWORN TO BEFORE ME this 14 day of July, 1999.

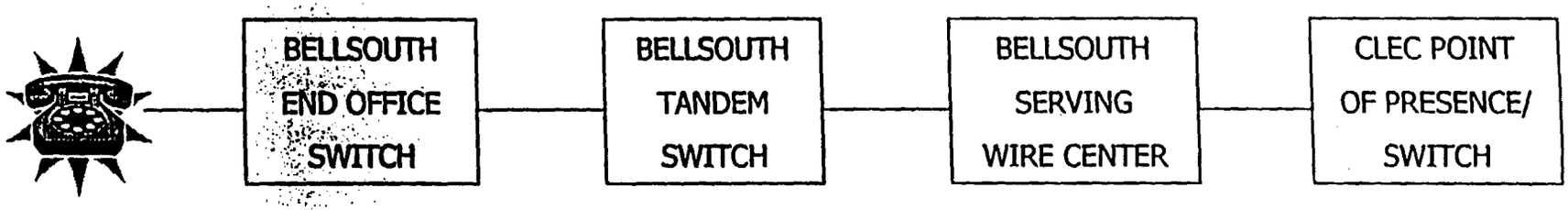
NOTARY PUBLIC

My Commission Expires:

NOTARY PUBLIC TAMMY A. KUELL
State of Florida
My comm. expires July 17, 1999
Comm. No. CC 481368
[ ] Personally Known [ ] Produced I.D.

EXHIBIT A

TYPICAL INTERCONNECTION OF CLEC AND BELLSOUTH SWITCHES



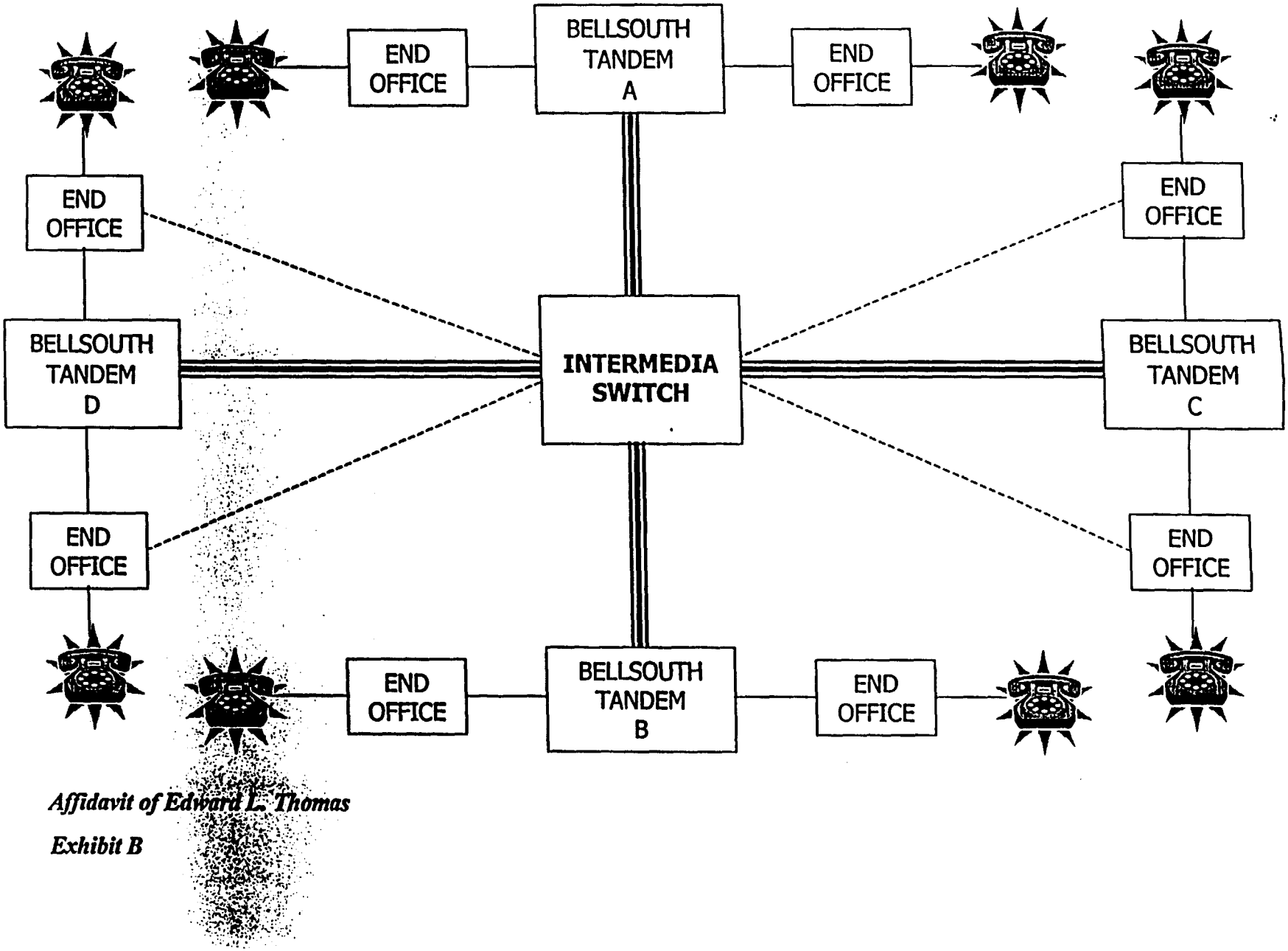
Affidavit of Edward L. Thomas

Exhibit A

80352

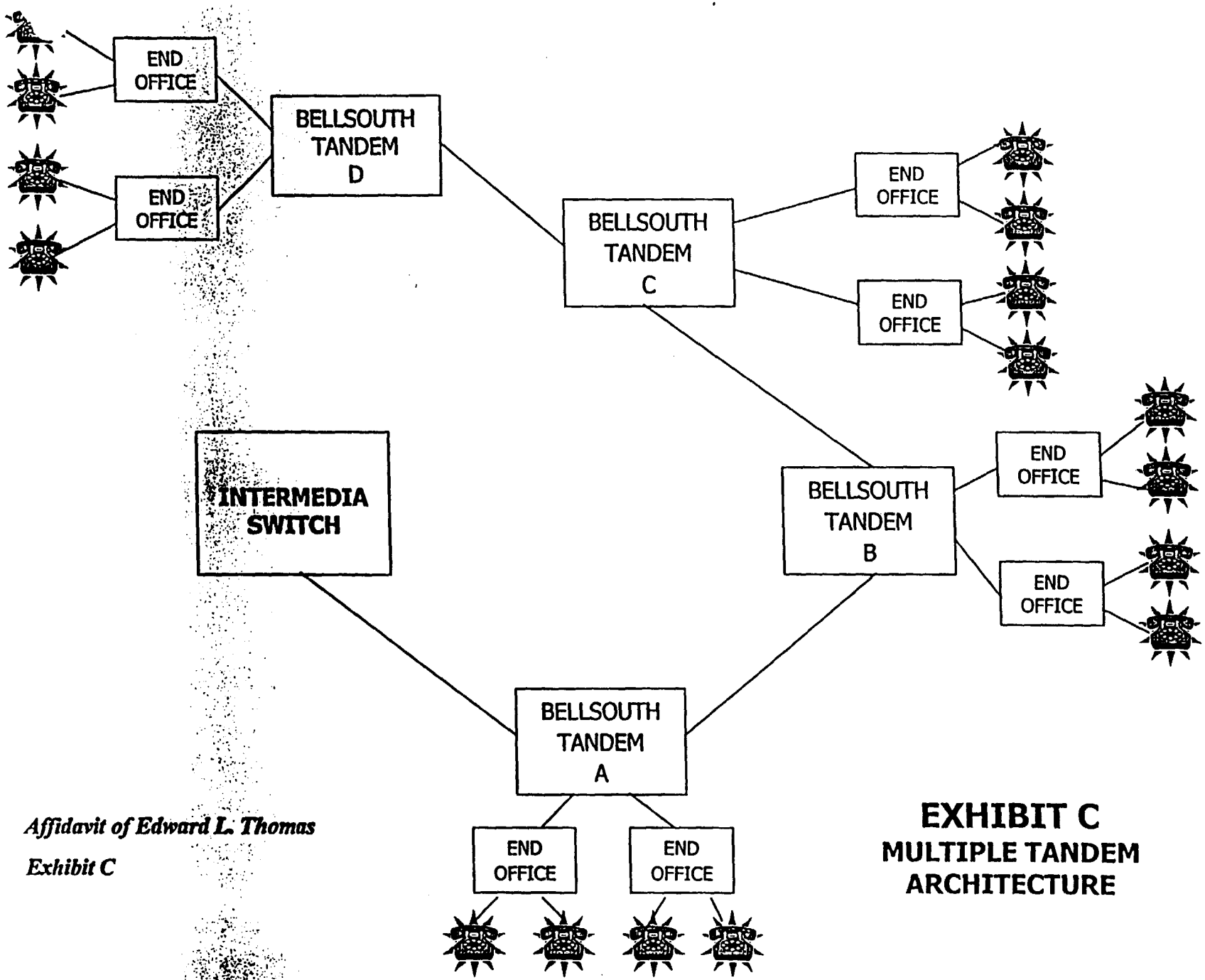
EXHIBIT B

SINGLE TANDEM ARCHITECTURE



Affidavit of Edward L. Thomas

Exhibit B



Affidavit of Edward L. Thomas

Exhibit C

EXHIBIT C
MULTIPLE TANDEM ARCHITECTURE

DUPLICATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

BELLSOUTH TELECOMMUNICATIONS, INC.,	)	
Plaintiff,	)	
v.	)	No. 1:99-CV-0518-JOF
INTERMEDIA COMMUNICATIONS, INC., GEORGIA PUBLIC SERVICE COMMISSION, STANCIL O. WISE in his official capacity as Chairman, LAUREN "BUBBA" MCDONALD, in his official capacity as Commissioner, ROBERT DURDEN, in his official capacity as Commissioner, and ROBERT B. BAKER, JR., in his official capacity as Commissioner,	)	
Defendants.	)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S RESPONSE TO INTERMEDIA COMMUNICATIONS, INC.'S MOTION TO COMPEL PAYMENT INTO COURT

BellSouth Telecommunications, Inc. ("BellSouth") hereby responds to and opposes Intermedia Communications, Inc.'s ("Intermedia") Motion to Compel BellSouth Telecommunications, Inc. To Deposit Funds Into Court In Accordance With The Court's Order (the "Motion"). The Court should deny Intermedia's Motion for two reasons. First, BellSouth has complied with, and will continue to comply with, the Court's April 30, 1999 Order (Docket No. 19) ("April 1999 Order") regarding the deposit of funds with the Court. Second, BellSouth agrees with Intermedia that the rate dispute that has arisen between BellSouth and Intermedia is not properly before this Court and should be resolved by the Georgia Public Service Commission

(the "GPSC"). The dispute over the appropriate reciprocal compensation rate the parties should be paying in Georgia has nothing to do with the issue presently before the Court, namely whether BellSouth is obligated to pay reciprocal compensation for non-local ISP-bound traffic pursuant to the terms of the parties' interconnection agreement. Consequently, BellSouth regrets that Intermedia continues to attempt to embroil the court in this rate dispute, particularly because, after the filing of the Motion, BellSouth offered to escrow the funds associated with this rate dispute in a separate account pending resolution of the issue by the GPSC. Intermedia rejected BellSouth's offer, proposing instead that the funds be placed with the registry of the court, and remain with the court until the GPSC resolves the rate dispute, even though the rate dispute is not before the Court. Indeed, Intermedia's proposal cannot be squared with its adamant position, as set forth in its Motion, that "this Court is not the jurisdictional forum for...the enforcement issue...." (Motion at 13). For these reasons, BellSouth respectfully requests that the Court deny Intermedia's Motion.

DISCUSSION

I. BELLSOUTH HAS COMPLIED FULLY WITH THE COURT'S ORDER TO DEPOSIT FUNDS INTO COURT.

In its Motion, Intermedia claims that BellSouth has failed to comply with the Court's April 1999 Order by not paying into Court the sums invoiced by Intermedia. Intermedia's position is based on a misunderstanding of the Court's April 1999 Order. In the April 1999 Order, the Court directed "that BellSouth shall deposit with the Court, no later than May 4, 1999, all sums that have been billed to BellSouth by Intermedia *that would be due to Intermedia....*" (April 1999 Order at 2) (Emphasis added). The Court further directed that "BellSouth shall deposit with the Court all sums of disputed reciprocal compensation that have been billed to